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March 15, 2021

**BY ECF**

The Honorable Diane Gujarati  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Walls et. al. v. Beech-Nut Nutrition Company et. al.*, Case No. 21-cv-00870,  
Letter Motion for Extension of Nurture Inc.'s Deadline to Respond to the Complaint

Dear Judge Gujarati:

We represent Defendant Nurture, Inc. in the above-referenced action.

Pursuant to Section I.F of this Court's Individual Practice Rules, we write to request a 60-day extension of Nurture's deadline to respond to the complaint from March 25, 2021 until May 24, 2021. Nurture seeks this extension so that it can have additional time to investigate the factual allegations set forth in Plaintiffs' complaint and consider whether, and how, this lawsuit should be coordinated with the numerous other lawsuits pending in federal courts around the country concerning the alleged presence of heavy metals in certain of Nurture's baby foods.

This is Nurture's first request for an extension of time to respond to the complaint, and the extension will not affect any pending deadlines set by Court order. The request is made with the consent of the Plaintiffs.

Respectfully submitted,

/s/ Negin Hadaghian  
Negin Hadaghian

cc: All counsel of record (by ECF)  
Angela C. Agrusa, *pro hac vice* pending (by e-mail)